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Attorneys for Defendant.  
CHEVRON U.S.A. INC.,  
a Pennsylvania corporation

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California  
Corporation, and DOES 1 through 10,  
inclusive,

Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DECLARATION OF ROBERT E.  
MUSSIG IN SUPPORT OF  
DEFENDANT CHEVRON U.S.A.,  
INC.'S OPPOSITION TO PLAINTIFF  
MARK SNOOKAL'S MOTION IN  
LIMINE NO. 3 – TO EXCLUDE  
REFERENCES TO THIRD-PARTY  
MEDICAL INFORMATION**

Date: July 24, 2025

Time: 10:00 a.m.

Place: Courtroom 5B – Fifth Floor

District Judge: Hon. Hernán De. Vera

Magistrate Judge: Hon. A. Joel Richlin

Action Filed: August 3, 2023

Trial Date: August 19, 2025

**DECLARATION OF ROBERT MUSSIG**

I, Robert Mussig, declare as follows:

1. I am an attorney licensed to practice law in California. I am a partner with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron U.S.A. Inc., a Pennsylvania corporation. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. Plaintiff's medical records contain references to third-parties, including references to Plaintiff's relationship with his father as well as references to his relationship with his wife and her family. Among other things, his medical records show: "Mother had anxiety and depression, Maternal cousins have [history of] substance abuse. One has bipolar, one great uncle committed suicide[.]. One . . . whole sister has anxiety. Two half sisters both anorexic and one has trichalomenia." A copy of the relevant excerpt of Plaintiff's medical records can be provided upon request.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on July 15, 2025, at Los Angeles, California.

/s/ Robert Mussig  
ROBERT MUSSIG